

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

JEFFREY COHEN, on behalf of himself and on behalf of
all similarly situated employees,

Plaintiff,

v.

GERSON LEHRMAN GROUP, INC.,

Defendant.

Civil Action No.
09-CV-04352 (PKC)

SUPPLEMENTAL DECLARATION OF MICHAEL J. PUMA¹

I, Michael J. Puma, declare as follows:

I am an attorney licensed to practice in the State of New York and am a member in good standing of the State Bar of New York. I am a partner with the law firm of Morgan, Lewis & Bockius LLP (“Morgan Lewis”). Morgan Lewis represents Defendant Gerson Lehrman Group, Inc. (“Defendant” or “GLG”) in this action. I submit this Declaration in support of Defendant’s Motion for Summary Judgment.

1. Attached as Exhibit 1 is a true and correct copy of J. Cohen’s Essay for Admission to the Cornell MBA Program (bates-labeled COHEN 0108-0110).
2. Attached as Exhibit 2 is a true and correct copy J. Cohen’s Essay One for Admission to the Georgetown MBA Program (bates-labeled COHEN 0118-0119).
3. Attached as Exhibit 3 is a true and correct copy of J. Cohen’s Essay One for Admission to the Babson MBA Program (bates-labeled COHEN 0132-0134).

¹ Pursuant to the Court’s Order dated September 15, 2011 (Dkt. No. 164), Defendants hereby submit this supplemental declaration so that the following exhibits may be filed without redaction on the public record: 13, 25, 38, 39, 41, 42, 58, 59, 60, 61, 62, 68, 71-74, 80, 82 and 83.

4. Attached as Exhibit 4 is a true and correct copy of pertinent excerpts from the Deposition of Jeffrey Cohen taken on August 28, 2009.

5. Attached as Exhibit 5 is a true and correct copy of pertinent excerpts from the Deposition of Ashleigh Baldwin taken on December 7, 2010.

6. Attached as Exhibit 6 is a true and correct copy of pertinent excerpts from the Deposition of Todd Johnson taken on December 7, 2009.

7. Attached as Exhibit 7 is a true and a correct copy of pertinent excerpts from the Deposition of Dmitri Mehlhorn taken on September 11, 2010.

8. Attached as Exhibit 8 is a true and correct copy of pertinent excerpts from the Deposition of David Wolff dated November 4, 2010.

9. Attached as Exhibit 9 is a true and correct copy of pertinent excerpts from the Deposition of Matthew Ronen taken on October 2, 2010.

10. Attached as Exhibit 10 is a true and correct copy of pertinent excerpts from the Deposition of Jacqueline Dille taken on November 3, 2010.

11. Attached as Exhibit 11 is a true and correct copy of A. Baldwin's 2007 Self-Evaluation (bates-labeled GLG00004658).

12. Attached as Exhibit 12 is a true and correct copy of the GLG Compensation Summary of J. Cohen (bates-labeled GLG00000062).

13. Attached as Exhibit 13 is a true and correct copy of the GLG Employee Policies Manual (bates-labeled Cohen 0029-0063).

14. Attached as Exhibit 14 is a true and correct copy of J. Cohen's Handbook Acknowledgment (bates-labeled GLG00000074).

15. Attached as Exhibit 15 is a true and correct copy of GLG Compensation Summary for M. Ronen (bates-labeled RONEN_000000941).

16. Attached as Exhibit 16 is a true and correct copy of M. Ronen's Handbook Acknowledgment Form (bates-labeled Ronen_00000079).

17. Attached as Exhibit 17 is a true and correct copy of A. Baldwin's Hiring and Payroll Information (bates-labeled BALDWIN 0000000022).

18. Attached as Exhibit 18 is a true and correct copy of A. Baldwin's Handbook Acknowledgment Form (bates-labeled Baldwin_00000024).

19. Attached as Exhibit 19 is a true and correct copy of J. Cohen's 2007 Performance Evaluation (bates-labeled GLG00000080-82).

20. Attached as Exhibit 20 is a true and correct copy of J. Cohen's 2008 Performance Evaluation (bates-labeled COHEN 0025-26).

21. Attached as Exhibit 21 is a true and correct copy of M. Ronen's 2007 Performance Evaluation (bates-labeled RONEN_000000050-54).

22. Attached as Exhibit 22 is a true and correct copy of M. Ronen's 2008 Performance Evaluation.

23. Attached as Exhibit 23 is a true and correct copy of A. Baldwin's 2007 Performance Evaluation (bates-labeled GLG00004660).

24. Attached as Exhibit 24 is a true and correct copy of Baldwin's 2008 Performance Evaluation (bates-labeled GLG00004665).

25. Attached as Exhibit 25 is a true and correct copy of Points of Emphasis document sent by J. Cohen to Brad Spiegel for him to draft business school recommendation letters (bates-labeled GLG00002052-59).

26. Attached as Exhibit 26 is a true and correct copy of a J. Cohen Letter to Kingsley Associates (seeking consideration for Real Estate Analyst position) (bates-labeled COHEN 0147).

27. Attached as Exhibit 27 is a true and correct copy of a J. Cohen Letter to Sverica International (seeking consideration for Financial Analyst position) (bates-labeled COHEN 0154).

28. Attached as Exhibit 28 is a true and correct copy of a J. Cohen Letter to Goldman Sachs (seeking consideration for Financial Analyst position) (bates-labeled COHEN 0144).

29. Attached as Exhibit 29 is a true and correct copy of J. Cohen's Resume (bates-labeled GLG0000001).

30. Attached as Exhibit 30 is a true and correct copy of a J. Cohen Letter Seeking Consideration for Search Associate position (bates-labeled COHEN 0151).

31. Attached as Exhibit 31 is a true and correct copy of J. Cohen's Resume (bates-labeled Cohen 00083).

32. Attached as Exhibit 32 is a true and correct copy of M. Ronen's Application for Admission to the Tuck School of Business at Dartmouth (bates-labeled RONEN 01127-73).

33. Attached as Exhibit 33 is a true and correct copy of D. Temple's Recommendation Letter in Support of Ronen's Application for Admission to the Tuck School of Business at Dartmouth (bates-labeled GLG00004677-4680).

34. Attached as Exhibit 34 is a true and correct copy pertinent excerpts of the Deposition of David Wolff taken on November 4, 2010.

35. Attached as Exhibit 35 is a true and correct copy of M. Ronen's December 16, 2009 correspondence to a prospective employer (bates-labeled RONEN 00002).

36. Attached as Exhibit 36 is a true and correct copy of M. Ronen's December 16, 2009 correspondence to another prospective employer (bates-labeled RONEN 01267-68).

37. Attached as Exhibit 37 is a true and correct copy of M. Ronen's Application to the Columbia Business School (bates-labeled RONEN 01088-1108).

38. Attached as Exhibit 38 is a true and correct copy of the September 2008 Edition of GLG Research Management's "The Greenies" (bates-labeled GLG000000763-76). (Not electronically filed pending Defendant's Motion to File Under Seal, to be filed on April 29, 2011.)

39. Attached as exhibit 39 is a true and correct copy of M. Ronen's Presentation Entitled "Intro to GLG Products, Beyond Phone Calls" (bates-labeled RONEN_0000001284-1300). (Not electronically filed pending Defendant's Motion to File Under Seal, to be filed on April 29, 2011.)

40. Attached as Exhibit 40 is a true and correct copy of M. Ronen's Application for Admission to Cornell University's Johnson School of Business (bates-labeled RONEN 01109-1126).

41. Attached as Exhibit 41 is a true and correct copy of the September 2007 Edition of GLG Research Management "The Greenies" (bates-labeled GLG000000730-749). (Not electronically filed pending Defendant's Motion to File Under Seal, to be filed on April 29, 2011.)

42. Attached as Exhibit 42 is a true and correct copy of the July 2007 Edition of GLG Research Management "The Greenies" (bates-labeled GLG000000721-729). (Not electronically filed pending Defendant's Motion to File Under Seal, to be filed on April 29, 2011.)

43. Attached as Exhibit 43 is a true and correct copy of J. Cohen's Essay Three for Admission to the Georgetown MBA Program (bates-labeled COHEN 0124-26).

44. Attached as Exhibit 44 is a true and correct copy of J. Cohen's Essay Three for Admission to the Babson MBA Program (bates-labeled COHEN 0138-19).

45. Attached as Exhibit 45 is a true and correct copy of J. Cohen's Essays for Admission to the USC, Marshall School of Business (bates-labeled COHEN 0084-90).

46. Attached as Exhibit 46 is a true and correct copy of J. Cohen's 2007 Self-Evaluation (bates-labeled GLG000001981-1985).

47. Attached as Exhibit 47 is a true and correct copy of the J. Cohen Letter to Robert K. Futterman & Associates (seeking consideration for Research Analyst position) (bates-labeled COHEN 0150).

48. Attached as Exhibit 48 is a true and correct of M. Ronen's Application for Admission to the Stern School of Business at NYU (bates-labeled RONEN 01203-1233).

49. Attached as Exhibit 49 is a true and correct copy of M. Ronen's GLG Management Self Evaluation for 2008 (bates-labeled GLG00004926-4930).

50. Attached as Exhibit 50 is a true and correct copy of M. Ronen's 2007 Self-Evaluation (bates-labeled RONEN_00000968 – 0000972).

51. Attached as Exhibit 51 is a true and correct copy of M. Ronen's 2008 GLG Research Management Self-Evaluation for 2008 (bates-labeled RONEN_000000955-958).

52. Attached as Exhibit 52 is a true and correct copy of an E-mail Correspondence from Robert Matule to Ronen (bates-labeled RONEN 01518-1520).

53. Attached as Exhibit 53 is a true and correct copy of D. Temple's Recommendation Letter in Support of Ronen's Application for Admission to the Cornell School of Business (bates-labeled RONEN 01312-01316).

54. Attached as Exhibit 54 is a true and correct copy of D. Temple's Recommendation Letter in Support of Ronen's Application for Admission to Yale University (bates-labeled RONEN_0000000133- 000000136).

55. Attached as Exhibit 55 is a true and correct copy of pertinent excerpts of the deposition of Todd Schaefer taken on November 5, 2010.

56. Attached as Exhibit 56 is a true and correct copy of B. Spiegel's letter of recommendation for J. Cohen (bates-labeled GLG000002011-000002013).

57. Attached as Exhibit 57 is a true and correct copy of a September 4, 2008 e-mail from Ronen to Sam Jacobs (bates-labeled RONEN 000250).

58. Attached as Exhibit 58 is a true and correct copy of a November 19, 2008 e-mail correspondence from Sam Jacobs (bates-labeled RONEN 00112-114).

59. Attached hereto as Exhibit 59 is a true and correct copy of the GLG Compliance Rules and Practices Guide for Research Managers and Associates, last updated July 15, 2008 (bates-labeled GLG00000541-629).

60. Attached hereto as Exhibit 60 is a true and correct copy of the GLG Compliance Rules and Practices Guide for Research Managers and Associates, last updated March 13, 2008 (bates-labeled GLG00001182-1263).

61. Attached as Exhibit 61 is a true and correct copy of a T. Johnson Email to Cohen dated 04/25/2007 (bates-labeled GLG00001845-53).

62. Attached as Exhibit 62 is a true and correct copy of a T. Johnson Email to Cohen dated 11/13/2007 (bates-labeled GLG00001907).

63. Attached as Exhibit 63 is a true and correct copy of A. Baldwin's 2008 Promotion Recommendation (bates-labeled Baldwin_00000924).

64. Attached as Exhibit 64 is a true and correct copy of a T. Johnson Email to Cohen dated 11/06/2007 (bates-labeled GLG00001879-80).

65. Attached as Exhibit 65 is a true and correct copy of a T. Johnson email to Cohen dated 11/19/2007 (bates-labeled GLG00001915).

66. Attached as Exhibit 66 is a true and correct copy of a T. Johnson email to Cohen dated 12/3/2007 (bates-labeled GLG00001925).

67. Attached as Exhibit 67 is a true and correct copy of a T. Johnson email to Cohen dated 1/14/2008 (bates-labeled GLG00001936).

68. Attached as Exhibit 68 is a true and copy of TMT Knowledge Initiative "Middleware" Presentation by Cohen (bates-labeled GLG0000090-100).

69. Attached as Exhibit 69 is a true and correct copy of the TMT Knowledge Initiative "May TMT Wrap Up" Presentation by T. Johnson and Cohen (bates-labeled GLG00000101-29).

70. Attached as Exhibit 70 is a true and correct copy of J. Cohen's 2008 Self-Evaluation (bates-labeled GLG0000070-71).

71. Attached as Exhibit 71 is a true and correct copy of a document titled "Broadening the Product Portfolio" document (bates-labeled GLG00001843-44). (Not electronically filed pending Defendant's Motion to File Under Seal, to be filed on April 29, 2011.)

72. Attached as Exhibit 72 is a true and correct copy of a R. Matule E-mail to LOWG (bates-labeled GLG00001965-66) (Not electronically filed pending Defendant's Motion to File Under Seal, to be filed on April 29, 2011.)

73. Attached as Exhibit 73 is a true and correct copy of a P. Sullivan Email to LOWG (bates-labeled GLG0000001972-73). (Not electronically filed pending Defendant's Motion to File Under Seal, to be filed on April 29, 2011.)

74. Attached as Exhibit 74 is a true and correct copy of a J. Cohen Email to I. Islam dated 9/16/2008 (bates-labeled GLG00001832).

75. Attached as Exhibit 75 is a true and correct copy of a document titled "Points of Emphasis (bates-labeled GLG00002006-2008).

76. Attached as Exhibit 76 is a true and correct copy of J. Cohen's Linked-in Resume (bates-labeled GLG00000010-11).

77. Attached as Exhibit 77 is a true and correct copy of Essay Two for Admission to the Georgetown MBA Program (bates-labeled COHEN 0121-23).

78. Attached as Exhibit 78 is a true and correct copy of J. Cohen Letter to Park Sutton Advisors (bates-labeled COHEN 0149).

79. Attached as Exhibit 79 is a true and correct copy of a T. Johnson E-mail to Cohen dated 11/15/2008 (bates-labeled GLG00002048-50).

80. Attached as Exhibit 80 is a true and correct copy of a T. Johnson E-mail to Cohen dated 2/1/2008 (bates-labeled GLG00002060-61).

81. Attached as Exhibit 81 is a true and correct copy of Ronen's Application for Admission to the Kellogg School of Management (bates-labeled RONEN_0000001174-1186).

82. Attached as Exhibit 82 is a true and correct copy of a July 30, 2008 e-mail from Ronen setting forth proposal for "2-Strike Rule" (bates-labeled GLG0004931-4934). (Not electronically filed pending Defendant's Motion to File Under Seal, to be filed on April 29, 2011.)

83. Attached as Exhibit 83 is a true and correct copy of an August 13, 2008 e-mail correspondence from Ronen (bates-labeled GLG00004935-4939). (Not electronically filed pending Defendant's Motion to File Under Seal, to be filed on April 29, 2011.)

84. Attached as Exhibit 84 is a true and correct copy of M. Ronen's Application to the Yale School of Management, Essay #2 (bates-labeled RONEN 01234-1260).

85. Attached as Exhibit 85 is a true and correct copy of A. Baldwin's 2008 Self-Evaluation (bates-labeled GLG00004655).

86. Attached as Exhibit 86 is a true and correct copy of GLG's Employee Policies, last updated August 2008 (bates-labeled GLG0000410-449).

87. Attached as Exhibit 87 is a true and correct copy of GLG's End User Computing Policies (bates-labeled GLG00000333-53).

88. Attached as Exhibit 88 is a true a correct copy of GLG's Intellectual Property, Confidentiality, and Non-Competition Agreement signed by J. Cohen (bates-labeled GLG0000083-88).

89. Attached as Exhibit 89 is a true and correct copy of J. Cohen's Signed Verification (bates-labeled GLG00000021).

90. Attached as Exhibit 90 is a true and correct copy of document titled "Questions to Ask" (bates-labeled GLG00002065).

91. Attached is Exhibit 91 is a true and correct copy of the email from D. Temple to M. Ronen dated 10/17/2008.

92. Attached as Exhibit 92 is a true and correct copy of a letter from L. Battaglia to G. Filosa dated 9/15/2010.

93. Attached as Exhibit 93 is a true and correct copy of a screenshot About Gerson Lehrman Group, <http://www.glgroup.com/about.html> (last visited Mar. 8, 2011).

94. Attached as Exhibit 94 is a true and correct copy of pertinent excerpts from the Deposition of Deborah Barker taken on October 28, 2010.

95. I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing information is true and correct, based upon my knowledge, information and belief.

Dated: October 17, 2011

/s/ Michael J. Puma
Michael J. Puma